

May 9, 2002

John Silva
Federal Aviation Administration
12 New England Industrial Park
P.O. Box 510
Burlington, Massachusetts 01803-5299

Re: Draft Environmental Impact Statement Groton-New London Airport: Runway 5-23 Safety Area Construction, Groton, Connecticut (ERP Number FHW-B51020-CT)

Dear Mr. Silva:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for the Runway 5-23 Safety Area Construction at Groton-New London Airport in Groton, Connecticut.

The DEIS explains that the current runway safety area associated with runway 5-23 does not meet federal standards. The purpose of the project is to make improvements to meet these design standards to the maximum extent practicable. In addition to the No-Build alternative the DEIS considers both a full-build alternative and a scaled back version of the full build option referred to as the modified-build alternative. The full build alternative would involve construction of a full runway safety area consistent with FAA standards while the modified-build alternative would include smaller, more environmentally sensitive improvements including an aircraft arresting system. The DEIS explains that the safety improvements will not result in any changes to flights or operational characteristics of the airport. Based on our review of the information provided, we have no objections to the modified build alternative proposal recommended in the DEIS. We do, however, have several concerns with respect to the alternatives analysis, coastal wetland impacts, and mitigation measures that should be addressed prior to the close of the NEPA process. Specific detailed comments are offered below.

Alternatives

The DEIS explains that runway reorientation was considered but rejected due to the potential for impacts and financial and aeronautical constraints. The record on this point should be expanded to explain in greater detail the analysis of reorienting Runway 5-23 and the basis for rejecting it as an alternative. In particular, runway reorientation where the 23 end of the runway would be shifted slightly

to the west and the 5 end is pivoted approximately 10 degrees to the northwest was suggested in screening meetings and public meetings as a means to reduce environmental impact. The analysis should address this issue and provide more detail about project costs if they are a significant determining factor in the decision-making process. In addition, we would appreciate more information about the Engineered Materials Arresting System (EMAS) to understand how large it would be and whether alternative EMAS configurations with a smaller footprint could be employed¹. As part of this effort more detailed plans, dimensions, cross sections, and elevations for the RSA's and EMAS system should be provided.

Impacts and Mitigation

According to the DEIS the modified build alternative will fill 1.2 acres of estuarine emergent wetland in the vicinity of Baker Cove and 0.01 acres of a small creek tributary to Baker Cove to accommodate the safety area beyond Runway 5. These areas provide nursery grounds for fish and shellfish and are part of a larger tidal wetland system used by a variety of birds and mammals for breeding, nesting and foraging. Additional impacts include potential water quality impacts to Baker Cove from stormwater runoff flow directly to the Cove without the benefit of a natural tidal wetland buffer.

We agree with statements in the DEIS that an aggressive mitigation program is necessary if the runway safety area work is pursued. The FEIS should expand the discussion of possible mitigation for wetland impacts associated with the project. Specifically, it should explain how functions and values of the impacted wetland areas will be replaced and how the mitigation areas will be monitored over time to ensure compliance. We encourage the FAA to coordinate closely on this matter with the Army Corps of Engineers, EPA, United States Fish and Wildlife Service and the National Marine Fisheries Service as appropriate prior to the publication of the Final Environmental Impact Statement (FEIS). The results of this coordination should be provided in the FEIS.

Conclusion/Rating

We note that while the DEIS focuses on safety issues associated with runway 5-23, Runway 15-33 is less than 4000 feet long and appears to have little to no safety area. This makes us question whether there is any other safety work that should be evaluated as part of the review of this project and whether the approach to runway safety areas at the airport is consistent. EPA looks forward to learning more

¹ The EMAS is described as a paved area several hundred feet in length beyond the runway end, with a soft concrete bed located on the "outer portion" of the paved area. It is not apparent how large this outer portion is or whether the paved area can be reduced in size, perhaps with a larger (or smaller) EMAS area. Finally, it is not clear how the size of the paved area and EMAS was determined.

about this issue, and to reviewing additional information about the reduced-impact alternative and associated mitigation and monitoring measures that will reduce the overall impact of the project.

For the reasons discussed above, EPA has rated this EIS "EC-2-Environmental Concerns-Insufficient Information" in accordance with EPA's national rating system, a description of which is attached to this letter. We believe the concerns we have identified can be resolved and we look forward to continuing to work with you towards the completion of the environmental review of this project. Please feel free to contact me or Timothy Timmermann of EPA's Office of Environmental Review at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

Robert W. Varney
Regional Administrator

Attachment

cc:

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